

EXHIBIT 1

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

SYMBOLGY INNOVATIONS, LLC,

Plaintiff,

v.

LEGO SYSTEMS, INC.

Defendant.

CIVIL ACTION NO. 2:17-cv-00086

**DECLARATION OF LEIGH ROTHSCILD IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANT LEGO SYSTEMS, INC.'S MOTION TO TRANSFER**

1. My name is Leigh M. Rothschild. I submit this Declaration in support of the Plaintiff Symbology Innovations, LLC's ("Symbology") Opposition to Defendant Lego Systems, Inc's Motion to Transfer.
2. I am over 18 years of age, and I am fully competent to make this sworn declaration. I have personal knowledge of the facts stated in this declaration, and they are all true and correct.
3. I have an undergraduate and graduate degree in History and Business from the University of Miami.
4. I am the founder of Symbology, the plaintiff in this lawsuit.
5. I am the sole inventor of U.S. Patent Nos. 7,992,773 (the " '773 Patent"), 8,424,752 (the " '752 Patent"); 8,651,369 (the " '369 Patent"); and 8,936,190 (the " '190 Patent), which are the patents-in-suit in this lawsuit. The patents-in-suit were prosecuted by Atanu Das, an attorney located in Chicago, IL.
6. I continue to research and develop new technology related to QR codes and I envision being an inventor on additional patents related to QR codes.

7. Symbology is a Texas limited liability company, with its principal place of business at 1400 Preston Road, Suite 400, Plano, Texas 75093. Symbology's principal place of business is located in Collin County, Texas, in the Eastern District of Texas. Documents related to the licensing and litigation of Symbology patents are located in Texas.

8. I live in Miami, Florida. I maintain my records in Miami, Florida.

9. I expect to be a witness at the trial of this case. It would be far more convenient for me to appear as a witness in the Eastern District of Virginia, rather than in the District of Connecticut.

10. Symbology maintains the majority of its physical documents in Miami, Florida.

11. Symbology is the sole and exclusive owner of all rights, title and interest in and to the patents-in-suit. Symbology acquired the rights to the patents-in-suit from Ariel Inventions, LLC, which is located in Miami, Florida.

12. By its formation and continued existence in Texas, Symbology is a bona fide citizen of Texas in the Eastern District of Texas and has subjected itself to all of the responsibilities that being a citizen of Texas entails.

13. Symbology does not have any business activities in the District of Connecticut. It has never filed any lawsuit in the District of Connecticut. It would be inconvenient for Symbology to litigate in the District of Connecticut rather than in the Eastern District of Virginia. No Symbology party witness is located in the District of Connecticut, and any party witness would have to travel to the District of Connecticut if the case were transferred there. This would involve traveling under circumstances less convenient than any travel involved in connection with this case being in the Eastern District of Virginia. In addition, Symbology's documents are not in the District of Connecticut and would have to be transported there if the case were transferred. The transportation would be less convenient than if the case remains in this District.

14. In summary, Symbology is a bona fide Texas company and citizen of the Eastern District of Texas. The Eastern District of Virginia is far more convenient for Symbology to litigate this case than the District of Connecticut.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 17, 2017

A handwritten signature in black ink, appearing to read 'Leigh M. Rothschild', written over a horizontal line.

Leigh M. Rothschild